

**AFFIDAVIT OF ERIN ALLEGRE**

STATE OF OKLAHOMA                     )  
   )  
COUNTY OF CLEVELAND                )       SS:

I, Erin Allegre, being duly sworn upon my oath, state the following facts:

- 1) I am currently the comptroller for BRSI LLC and Oklahoma Motor Cars LLC. Part of my job duties for BRSI LLC is to balance the accounts and monies associated with the business. This includes petty cash checks written to the dealership.
- 2) At Big Red Sports and Imports, there are, and have been, three (3) tills containing petty cash; one in service, one in parts, and one in the accounting office. The purpose of the petty cash tills is to give employees access to cash for small dollar amounts for office expenses. The petty cash tills mentioned previously contain approximately a few hundred dollars in each till. There are two reasons money is used from a petty cash till:  
1) money is taken from the till to buy office supplies or other necessary items (these expenses are usually for non-reoccurring expenses and for small dollar amounts), and  
2) petty cash money is used to pay bonuses to sales staff working on Saturdays. To pay the bonuses, a manager is given \$1000 on Friday to reward sales staff who complete car sales for the dealership on Saturday. This usually comes in the form of \$20 to \$100 payments for each car sold. If any of the \$1000 remains after the work day on Saturday, the money is returned to the petty cash till. Additionally, a receipt is generated noting how much money was used and to whom the money was paid. When petty cash is used for small dollar office expenses (under the first scenario), the employee provides a receipt to my office and I cause a check to be issued to petty cash for reimbursement and to make sure the till balances. A copy of the receipt for the items purchased is stored with the check for record keeping purposes.
- 3) On approximately May 10, 2022, I was tasked with reviewing copies of petty cash checks that were found in a purple folder in an office used by Courtney Wells. I have since located the actual checks in our business records. The checks identified far exceeded the typical dollar amounts for petty cash checks. Additionally, there were no receipts related to the checks that would justify or identify the reason for the money being spent. The records identified fit a pattern of embezzlement from the dealership. These payments are unique and do not fit the documented system for other petty cash checks written at the same time.
- 4) In reviewing the records, I have identified approximately \$140,000 worth of petty cash checks that have no corresponding receipt or explanation.

Dated this 17<sup>th</sup> day of June, 2022.

Erin Allegre  
Erin Allegre

Subscribed and sworn to before me this 17<sup>th</sup> day of June, 2022.

[Signature]  
Notary Public

Notary Number: 20009203

My commission expires: 7.30.24

